

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

TRUSTEES OF THE PLUMBERS AND  
PIPEFITTERS NATIONAL PENSION FUND,

Plaintiffs,

V.

MCREYNOLDS PROCESS PIPING AND  
PLUMBING, LLC,

Defendant.

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) CIVIL ACTION NO. 1:21-cv-140  
) TSE-MSN

**REQUEST FOR ENTRY OF DEFAULT PURSUANT TO**  
**F.R.C.P 55(a)**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiffs, through undersigned counsel, hereby request the Clerk to enter default in the above-captioned case. Defendant McReynolds Process Piping and Plumbing, LLC has failed to plead or otherwise defend the Complaint filed on February 8, 2021 (Docket #1). The Summons was issued on February 9, 2021 (Docket #4). The Complaint and Summons were served on April 14, 2021 (Docket #5), as provided in Rule 55(a) of the Federal Rules of Civil Procedure as appears in the attached Declaration of John R. Harney, Esquire.

A proposed Entry of Default is attached.

Respectfully submitted,

Date: July 20, 2021

By: \_\_\_\_\_ /s/  
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[illegible]

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## CERTIFICATE OF SERVICE

I hereby certify that on the 20<sup>th</sup> day of July, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

No parties other than the Plaintiffs counsel registered.

And I hereby certify that I have mailed the document by U.S. Mail, postage prepaid to the following non-filing users:

James D. McReynolds, Member & Registered Agent  
McReynolds Process Piping and Plumbing LLC  
8155 Old Buffalo Road  
Gracey, KY 42232

/s/

John R. Harney, Bar No. 41520  
Counsel for Plaintiff Funds  
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